

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

APR 11 2019

Magistrate Judge Sidney I. Schenkier  
United States District Court

In the Matter of the Search of:

Case Number:

the USPS Priority Mail package bearing tracking  
number 9505506585019099070722, further described  
in Attachment A

19M244

## APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Kenneth R. Pflanz, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Offense Description

Title 21, United States Code, Section 843(b)

narcotics

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.

  
Applicant's SignatureKENNETH R. PFLANZ, Postal Inspector, U.S. Postal  
Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: April 11, 2019

  
Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge  
Printed name and title

UNITED STATES DISTRICT COURT       )  
  )  
NORTHERN DISTRICT OF ILLINOIS       )

**AFFIDAVIT**

I, Kenneth R. Pflanz, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service. I have been so employed since approximately February 18, 2006.

2. As part of my duties as a USPS Postal Inspector, I investigate criminal violations relating to violations of the federal laws relating to the mails and to controlled substances.

3. This affidavit is made in support of an application for a warrant to search the USPS Priority Mail Parcel with Tracking Number 9505506585019099070722, described further in Attachment A (the "Subject Parcel"), for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence,

instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

**I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL**

5. On April 11, 2019, law enforcement inspected the **Subject Parcel** at Wauconda Police Department, 311 S. Main St., Wauconda, IL 60084. The **Subject Parcel** was mailed on April 9, 2019, from Dana Point, CA, 92629 and is addressed to "Jason Cameron, 525 Old Country Way, Wauconda, IL 60084," with no return address listed. The **Subject Parcel** bears \$88.90 in postage, measures approximately 16.5 x 16.5 x 16.5, and weighs approximately 38 lbs., 0 ounces.

6. Law enforcement observed several characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, law enforcement ran the recipient's name and address on the **Subject Parcel** through a law enforcement database.<sup>1</sup> The recipient's name is not associated with the address per USPS records and law enforcement databases. Based on my training and experience, fictitious sender or receiver names, and fictitious return addresses, can indicate that the sender or receiver does not want to be associated with the parcel.

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<sup>1</sup> Law enforcement did not run the sender's name and address through a law enforcement database, because no return sender was listed on the package.

8. The **Subject Parcel** is taped with clear packing tape on all of the parcel seams. Based on my training and experience, parcels can be taped in this manner in an attempt to hide or mask the odor of the parcel's contents.

9. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on my training and experience, however, the combination of these characteristics led law enforcement to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

10. On April 11, 2019, my office arranged for a Wauconda Police Department Canine Officer and his canine partner, "Varro," to meet and examine the **Subject Parcel**. According to the Canine Officer, Varro is certified annually by the Wauconda Police Department as a narcotics dog. Varro was most recently re-certified on June 15, 2018. Varro is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Varro is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Varro has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 16 occasions since November 2017, with a success rate of approximately 94%. To the best of my knowledge, Wauconda Police Department does not maintain records regarding the

overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

11. On April 11, 2019, at the Wauconda Police Department in Wauconda, Illinois, law enforcement arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 5 other parcels in the workroom area. Law enforcement then witnessed Varro examine the parcels and observed Varro alert by scratching the **Subject Parcel**. Varro did not alert to any of the other parcels. The Canine Officer informed my office that Varro's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. Law enforcement then took custody of the **Subject Parcel**.

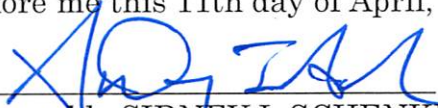
## II. CONCLUSION

12. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the Subject Parcel, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.

  
Kenneth R. Pflanz  
Postal Inspector  
U.S. Postal Inspection Service

Subscribed and sworn  
before me this 11th day of April, 2019

  
Honorable SIDNEY I. SCHENKIER  
United States Magistrate Judge

**ATTACHMENT A**

**DESCRIPTION OF ITEM TO BE SEARCHED**

The USPS Priority Mail Parcel with Tracking Number 9505506585019099070722, no return address listed, and a recipient address of "Jason Cameron, 525 Old Country Way, Wauconda, IL 60084." The **Subject Parcel** weighs approximately 38 lbs., 0 ounces, is approximately 16.5 x 16.5 x 16.5 in size, and bears \$88.90 in postage.

**ATTACHMENT B**

**LIST OF ITEMS TO BE SEIZED**

Evidence, instrumentalities and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency;
4. Items associated with controlled substances;
5. Items that identify the sender or intended recipient of the **Subject**

**Parcel.**



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
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the USPS Priority Mail package bearing tracking  
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in Attachment A

Case Number:

19M244

SEARCH AND SEIZURE WARRANT

To: Kenneth R. Pflanz and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of  
the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person  
or property described above, and that such search will reveal:


See Attachment B

**YOU ARE HEREBY COMMANDED** to execute this warrant on or before April 25, 2019 in the daytime (6:00  
a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property  
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the  
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an  
inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate  
Judge.

Date and time issued: April 11, 2019 4:42 PM

  
Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge  
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

**Return**

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title*

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**Parcel.**